

# **EXHIBIT 1**

**(FILED UNDER SEAL)**

# **EXHIBIT 2**

**(FILED UNDER SEAL)**

# **EXHIBIT 3**

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*Attorneys for Defendant Koninklijke Philips N.V.*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

This Document Relates to:

*Electrograph Sys., Inc. v. Hitachi, Ltd.*,  
No. 11-cv-01656;

*Electrograph Sys., Inc. v. Technicolor SA*,  
No. 13-cv-05724;

*Siegel v. Hitachi, Ltd.*,  
No. 11-cv-05502;

*Siegel v. Technicolor SA*,  
No. 13-cv-05261;

*Best Buy Co., Inc. v. Hitachi, Ltd.*,  
No. 11-cv-05513;

) Case No. 07-5944-SC

) MDL No. 1917

) **DECLARATION OF JAP JONGEDIJK IN**  
) **SUPPORT OF KONINKLIJKE PHILIPS**  
) **N.V.'S NOTICE OF MOTION AND**  
) **MOTION FOR SUMMARY JUDGMENT**

) Date: January 30, 2015

) Time: 10:00 a.m.

) Place: Courtroom No. 1, 17th Floor

) Hon. Samuel Conti

1 *Best Buy Co., Inc. v. Technicolor SA,*  
2 No. 13-cv-05264;  
3 *Interbond Corp. of Am. v. Hitachi, Ltd.,*  
4 No. 11-cv-06275;  
5 *Interbond Corp. of Am. v. Technicolor SA,*  
6 No. 13-cv-05727;  
7 *Office Depot, Inc. v. Hitachi, Ltd.,*  
8 No. 11-cv-06276;  
9 *Office Depot, Inc. v. Technicolor SA,*  
10 No. 13-cv-05726;  
11 *CompuCom Sys., Inc. v. Hitachi, Ltd.,*  
12 No. 11-cv-06396;  
13 *P.C. Richard & Son Long Island Corp. v.*  
14 *Hitachi, Ltd.,*  
15 No. 12-cv-02648;  
16 *P.C. Richard & Son Long Island Corp. v.*  
17 *Technicolor SA,*  
18 No. 13-cv-05725;  
19 *Schultze Agency Servs., LLC v. Hitachi, Ltd.,*  
20 No. 12-cv-02649;  
21 *Schultze Agency Servs., LLC v. Technicolor SA,*  
22 No. 13-cv-05668;  
23 *Tech Data Corp. v. Hitachi, Ltd.,*  
24 No. 13-cv-00157;  
25 *Dell Inc. v. Hitachi Ltd.,*  
26 No. 13-cv-02171;  
27 *Sears, Roebuck and Co. and Kmart Corp. v.*  
28 *Technicolor SA,*  
No. 13-cv-05262  
*Sears, Roebuck and Co. and Kmart Corp. v.*  
*Chunghwa Picture Tubes, Ltd.,*  
No. 11-cv-05514  
*Sharp Electronics Corp. v. Hitachi Ltd.,*  
No. 13-cv-1173 SC

1 *Sharp Electronics Corp. v. Koninklijke Philips* )  
2 *Elecs., N.V.,* )  
3 *No. 13-cv-2776 SC* )  
4 *ViewSonic Corp. v. Chunghwa Picture Tubes,* )  
5 *Ltd.,* )  
6 *No. 14-cv-2510 SC* )  
7 *All Indirect Purchaser Actions* )

1 I, Jap Jongedijk, declare and state as follows:

2 1. I am employed as Senior Legal Counsel for Philips International B.V. and previously  
3 served as Deputy Secretary of the Executive Committee of Koninklijke Philips N.V. ("KPNV"). I  
4 make this declaration in support of KPNV's Notice of Motion and Motion for Summary Judgment.  
5 The information contained herein is based on my own personal knowledge, and if called as a witness I  
6 could, and would, testify competently that the matters set forth herein are true.

7 2. Unless specifically stated otherwise, the information provided in this Declaration is true  
8 and correct for the period March 1995 through November 2007.

9 3. KPNV is a Dutch corporation with its principal place of business located at Amstelplein  
10 2, Breiner Center, 1070 MX, Amsterdam, The Netherlands.

11 4. KPNV is a holding company that employed nine to thirteen individuals at any point  
12 during the relevant time period.

13 5. KPNV does not direct the daily management or operation of any of its direct or indirect  
14 subsidiaries, including Philips Electronics North America Corporation, Philips Taiwan Limited, or  
15 Philips do Brasil Ltda. Instead, KPNV provides high level advice to its subsidiaries as well as business  
16 groups that work across KPNV's subsidiaries. These subsidiaries and business groups manage  
17 operations in the areas in which KPNV's subsidiaries conduct business.

18 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
19 true and correct.

20 Executed on November 6, 2014 at Amsterdam, The Netherlands.

21  
22  
23  
24  
25  
26  
27  
28



Jap Jongedijk

# **EXHIBIT 4**

**(FILED UNDER SEAL)**



# **EXHIBIT 5**

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*Attorneys for Defendant Koninklijke Philips N.V.*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-SC (N.D. Cal.)

MDL No. 1917

This Document Relates to:

ALL INDIRECT PURCHASER ACTIONS

**OBJECTIONS AND RESPONSES OF  
DEFENDANT KONINKLIJKE PHILIPS  
N.V. TO INDIRECT PURCHASER  
PLAINTIFFS' FIRST SET OF  
INTERROGATORIES**

PROPOUNDING PARTY:

Indirect Purchaser Plaintiffs

RESPONDING PARTY:

Koninklijke Philips N.V.

SET NO.:

One

1 and “withdraw” calls for a legal conclusion. KPNV also objects to the terms “co-conspirator”  
2 and “conspiracy” because they are vague and ambiguous, rendering this Interrogatory overbroad,  
3 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

4 Subject to and without waiving the objections stated above, KPNV incorporates  
5 its response to Interrogatory No. 5. Pursuant to Federal Rule of Civil Procedure 33(d), although  
6 not limited to the following, KPNV refers to the documents previously produced at the  
7 following Bates numbers: JLJ-00006725; PHLP-CRT-048151; PHLP-CRT-083229; PHLP-  
8 CRT-091134; PHLP-CRT-097321; PHLP-CRT-097358; PHLP-CRT-097364; PHLP-CRT-  
9 099889.

10 **INTERROGATORY NO. 7**

11 For each affirmative defense in your Answer, identify all Evidence supporting that  
12 defense, or state that the defense will no longer be asserted.

13 **RESPONSE TO INTERROGATORY NO. 7**

14 In addition to KPNV’s General Objections, which KPNV incorporates by reference,  
15 KPNV specifically objects to this Interrogatory on the grounds that it is overbroad, unduly  
16 burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and  
17 seeks information that is maintained by and equally available to IPPs or stated in publicly  
18 available documents. KPNV objects to this Interrogatory on the grounds that it calls for a legal  
19 conclusion. KPNV objects that the term “supporting” is vague and ambiguous, rendering this  
20 Interrogatory overbroad, unduly burdensome, and not reasonably calculated to lead to the  
21 discovery of admissible evidence. KPNV also objects to this Interrogatory on the grounds that it  
22 contains impermissible subparts as KPNV has identified over forty affirmative defenses in its  
23 Answer to the IPPs’ Complaint. KPNV further objects to this Interrogatory to the extent that  
24 providing a response for all of its affirmative defenses would cause the remaining interrogatories  
25 to exceed the allowable amount of twenty-five interrogatories as prescribed by the Federal  
26 Rules of Civil Procedure 33(a)(1).

27 **INTERROGATORY NO. 8**

For each year during the Class Period, state by year how many CRTs (in both number of units and revenue in U.S. dollars) that You: (a) billed to and shipped to the United States; (b) billed to an address in the United States, but shipped to a location outside of the United States; (c) shipped to an address in the United States, but billed to a location outside of the United States; and (d) shipped and billed to a location outside of the United States.

#### **RESPONSE TO INTERROGATORY NO. 8**

In addition to KPNV's General Objections, which KPNV incorporates by reference, KPNV specifically objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks information that is maintained by and equally available to IPPs or stated in publicly available documents. KPNV also objects that the phrases "billed to" and "shipped to" are vague and ambiguous, rendering this Interrogatory overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

KPNV further objects to this Interrogatory on the grounds that it is cumulative and duplicative of other discovery requests, and therefore in violation of the integration order included in section XV, subsections D and E of the Court's "Order Re Discovery and Case Management Protocol," entered in the MDL on April 3, 2012. Order Re discovery and Case Management Protocol, *In re Cathode Ray Tube Antitrust Litigation*, Case No. 07-cv-05944-SC MDL No. 1917 (N.D. Cal. April 3, 2012), Docket No. 1128. Specifically, this Interrogatory is duplicative of the following requests: Direct Purchaser Plaintiffs' Second Set of Requests for Production of Documents, Request No. 5, dated March 12, 2010, and Indirect Purchaser Plaintiffs' Second Request for Production of Documents, Request No. 5, dated March 25, 2010.

Subject to and without waiving the objections stated above, KPNV responds that KPNV is a holding company and at no point did it ever manufacture or sell any CRTs.

#### **INTERROGATORY NO. 9**

For each year during the Class Period, state by year how many CRT Products (in both number of units and revenue in U.S. dollars) that You: (a) billed to and shipped to the United

information,” “false commitment,” and “instance” are vague and ambiguous, rendering this Interrogatory overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

KPNV contends that at all times it was a holding company with investments in various wholly and partially owned subsidiaries and investments in various associates. KPNV asserts that no evidence has been brought in the above captioned matter that indicates that KPNV attended any Glass Meetings or Bilateral Meetings as defined by IPPs’ Interrogatories.

**INTERROGATORY NO. 25 - REQUEST FOR ADMISSION NO. 1**

If Your response to any of the Indirect Purchaser Plaintiffs’ First Set of Requests for Admission was anything other than an unqualified admission, separately for each Request for Admission:

- (a) state the number of the request for admission;
- (b) state all facts upon which You base Your response;
- (c) identify all Evidence upon which You intend to rely to support your response; and
- (d) identify each person who has knowledge of the facts upon which you base your response.

**RESPONSE TO INTERROGATORY NO. 25 - REQUEST FOR ADMISSION NO. 1**

In addition to KPNV’s General Objections, which KPNV incorporates by reference, KPNV specifically objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks information that is maintained by and equally available to IPPs or stated in publicly available documents. KPNV also objects to this Interrogatory on the grounds that it calls for a legal argument or legal conclusion. KPNV further objects to the use of the terms “unqualified,” “knowledge,” and “support” because they are vague and ambiguous, rendering this Interrogatory overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the objections, KPNV responds that KPNV is a holding

1 company and at no point did it ever manufacture or sell any CRTs.

2 **INTERROGATORY NO. 26 - REQUEST FOR ADMISSION NO. 2**

3 If Your response to any of the Indirect Purchaser Plaintiffs' First Set of Requests for  
4 Admission was anything other than an unqualified admission, separately for each Request for  
5 Admission:

6 (a) state the number of the request for admission;

7 (b) state all facts upon which You base Your response;

8 (c) identify all Evidence upon which You intend to rely to support your response; and

9 (d) identify each person who has knowledge of the facts upon which you base your  
10 response.

11 **RESPONSE TO INTERROGATORY NO. 26 - REQUEST FOR ADMISSION NO. 2**

12 In addition to KPNV's General Objections, which KPNV incorporates by reference,  
13 KPNV specifically objects to this Interrogatory on the grounds that it is overbroad, unduly  
14 burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks  
15 information that is maintained by and equally available to IPPs or stated in publicly available  
16 documents. KPNV also objects to this Interrogatory on the grounds that it calls for a legal  
17 argument or legal conclusion. KPNV further objects to the use of the terms "unqualified,"  
18 "knowledge," and "support" because they are vague and ambiguous, rendering this Interrogatory  
19 overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of  
20 admissible evidence.

21 Subject to and without waiving the objections, KPNV responds that KPNV is a holding  
22 company and at no point did it ever own or operate any CRT factories or CRT sales offices.

23 **INTERROGATORY NO. 27 - REQUEST FOR ADMISSION NO. 3**

24 If Your response to any of the Indirect Purchaser Plaintiffs' First Set of Requests for  
25 Admission was anything other than an unqualified admission, separately for each Request for  
26 Admission:

27 (a) state the number of the request for admission;

(d) identify each person who has knowledge of the facts upon which you base your response.

**RESPONSE TO INTERROGATORY NO. 148 - REQUEST FOR ADMISSION NO. 127**

In addition to KPNV's General Objections, which KPNV incorporates by reference, KPNV specifically objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks information that is maintained by and equally available to IPPs or stated in publicly available documents. KPNV also objects to this Interrogatory on the grounds that it calls for a legal argument or legal conclusion. KPNV further objects to the use of the terms "unqualified," "knowledge," and "support" because they are vague and ambiguous, rendering this Interrogatory overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. KPNV also objects to this Interrogatory to the extent it improperly tries to shift the evidentiary burden that IPPs alone carries to KPNV. Since IPPs Request for Admission No. 127 is based on an inaccurate premise that KPNV "provided a mandate to, or otherwise directed the activities of, Philips' representatives on the Supervisory Board of LG.Philps Displays," the Request creates a logical fallacy that requires no response.

Dated: September 3, 2014

BAKER BOTTS LLP



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*Attorney for Koninklijke Philips N.V.*



**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I caused a true and correct copy of the documents listed below to be served by e-mail transmission on September 3, 2014 to each of the persons set forth in the attached service list below.

1. Objections and Responses of Defendant Koninklijke Philips N.V. to Indirect Purchaser Plaintiffs' First Set Of Interrogatories

Dated: September 3, 2014



Charles M. Malaise

*In re: Cathode Ray Tube (CRT) Antitrust Litigation - MDL No. 1917***SERVICE LIST**

<p>Mario N. Alioto  Lauren C. Capurro (Russell)  E-mail: <a href="mailto:malioto@tatp.com">malioto@tatp.com</a>  E-mail: <a href="mailto:lauren russell@tatp.com">lauren russell@tatp.com</a>  TRUMP, ALIOTO, TRUMP &amp; PRESCOTT,  LLP</p> <p><i>Interim Lead Counsel for the Indirect  Purchaser Plaintiffs</i></p>	<p>Guido Saveri  R. Alexander Saveri  Geoffrey C. Rushing  E-mail: <a href="mailto:guido@saveri.com">guido@saveri.com</a>  E-mail: <a href="mailto:rick@saveri.com">rick@saveri.com</a>  E-mail: <a href="mailto:grushing@saveri.com">grushing@saveri.com</a>  SAVERI &amp; SAVERI, INC.</p> <p><i>Interim Lead Counsel for the Direct Purchaser  Plaintiffs</i></p>
<p>Philip J. Iovieno  Anne M. Nardacci  E-mail: <a href="mailto:piovieno@bsflp.com">piovieno@bsflp.com</a>  E-mail: <a href="mailto:anardacci@bsflp.com">anardacci@bsflp.com</a>  BOIES, SCHILLER &amp; FLEXNER LLP</p> <p><i>Liaison Counsel for Direct Action Plaintiffs</i></p>	<p>Emilio Varanini  E-mail: <a href="mailto:emilio.varanini@doj.ca.gov">emilio.varanini@doj.ca.gov</a>  OFFICE OF THE ATTORNEY GENERAL  OF CALIFORNIA</p> <p><i>Attorneys for the State of California</i></p>
<i>All defense counsel</i>	

# **EXHIBIT 6**

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 Erik T. Koons (*pro hac vice*)  
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*Attorneys for Defendant Koninklijke Philips N.V.*

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)  
 ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-SC (N.D. Cal.)

MDL No. 1917

**OBJECTIONS AND RESPONSES OF  
 DEFENDANT KONINKLIJKE PHILIPS  
 N.V. TO DAPS' FIRST SET OF  
 INTERROGATORIES**

This Document Relates to:

*Electrograph Systems, Inc., et al. v. Hitachi, Ltd., et al.*, No. 11-cv-01656;

*Siegel v. Hitachi, Ltd., et al.* No. 11-cv-05502;

*Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.*, No. 11-cv-05513;

*Target Corp., et al. v. Chunghwa Picture Tubes, Ltd., et al.*, No. 11-cv-05514;

*Interbond Corporation of America v. Hitachi, et al.*, No. 11-cv-06275;

*Office Depot, Inc. v. Hitachi Ltd., et al.*,

MDL 1917

1 No. 11-cv-06276;  
2 *CompuCom Systems, Inc. v. Hitachi, Ltd.*,  
3 et al., No. 11-cv-06396;  
4 *Costco Wholesale Corporation v. Hitachi,*  
5 *Ltd., et al., No. 11-cv-06397;*  
6 *P.C. Richard & Son Long Island*  
7 *Corporation, et al. v. Hitachi, Ltd., et al.,*  
8 No. 12-cv-02648;  
9 *Schultze Agency Services, LLC, et al. v.*  
10 *Hitachi, Ltd., et al., No. 12-cv-02649;*  
11 *Tech Data Corporation, et al. v. Hitachi,*  
12 *Ltd., et al., No.13-cv-00157;*  
13 *Dell Inc. and Dell Products L.P. v. Hitachi*  
14 *Ltd., et al., No.13-cv-02171;*  
15 *Siegel v. Technicolor SA, et al., No. 13-cv-*  
16 *05261;*  
17 *Sears, Roebuck & Co., et al. v. Technicolor*  
18 *SA, et al., No. 13-cv-05262;*  
19 *Best Buy Co., Inc., et al. v Technicolor SA,*  
20 *et al., No.13-cv-05264;*  
21 *Schultze Agency Services, LLC v.*  
22 *Technicolor SA, et al., No. 13-cv-05668;*  
23 *Target Corp., v. Technicolor SA, et al.,*  
24 *No.13-cv-05686;*  
25 *Costco Wholesale Corporation v.*  
26 *Technicolor SA, et al., No. 13-cv-05723;*  
27 *Electrograph Systems, Inc., et al. v.*  
28 *Technicolor SA, et al., No. 13-cv-05724;*  
*P.C. Richard & Son Long Island*  
*Corporation, et al. v. Technicolor SA, et al.,*  
No. 13-cv-05725;  
*Office Depot, Inc., v. Technicolor SA, et al.,*  
No. 13-cv-05726;  
*Interbond Corporation of America v.*  
*Technicolor SA, et al., No. 13-cv-05727;*  
*Sharp Electronics Corp. et al. v. Koninklijke*  
*Philips Elecs., N.V., et al., No. 13-cv-2776.*

1 PROPOUNDING PARTY:

Direct Action Plaintiffs Electrograph Systems, Inc. and  
Electrograph Technologies Corp.; Alfred H. Siegel, solely  
as Trustee of the Circuit City Stores, Inc. Liquidating  
Trust; Best Buy Co., Inc., Best Buy Purchasing LLC, Best  
Buy Enterprise Services, Inc., Best Buy Stores, L.P.,  
Bestbuy.com, L.L.C., and Magnolia Hi-Fi, Inc.; Target  
Corp., Sears, Roebuck, and Co., Kmart Corp.; Interbond  
Corporation of America; Office Depot, Inc.; CompuCom  
Systems, Inc.; Costco Wholesale Corporation; P.C.  
Richard & Son Long Island Corporation, MARTA  
Cooperative of America, Inc., and ABC Appliance, Inc.;  
Schultze Agency Services, LLC on behalf of Tweeter  
Opco, LLC and Tweeter Newco, LLC; Tech Data  
Corporation and Tech Data Product Management, Inc.;  
Dell Inc. and Dell Products L.P. ; Sharp Electronics  
Corporation; and Sharp Electronics Manufacturing  
Company of America, Inc.

10 RESPONDING PARTY:

Koninklijke Philips N.V.

11 SET NO.:

One

unqualified admission:

- (a) State the number of the request;
- (b) State all facts upon which you based your response;
- (c) Identify each person who has knowledge of those facts; and
- (d) Identify all documents that support your response

**RESPONSE TO INTERROGATORY NO. 9 - REQUEST FOR ADMISSION NO. 9**

In addition to KPNV's General Objections, which KPNV incorporates by reference, KPNV specifically objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks information that is maintained by and equally available to DAPs or stated in publicly available documents. KPNV also objects to this Interrogatory on the ground that it calls for a legal argument or legal conclusion. KPNV further objects to the use of the terms "unqualified," "knowledge," and "support" because they are vague, ambiguous, overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving its foregoing objections, KPNV states that the document bearing bates numbers PHLP-CRT-144478-144585 is an incomplete document; therefore, the proposed document bearing bates numbers PHLP-CRT-144478-144585 is not an authentic copy of a business record of KPNV.

**INTERROGATORY NO. 10. - REQUEST FOR ADMISSION NO. 13**

If your response to any request for admission in Direct Action Plaintiffs' First Set of Requests for Admission to Philips Defendants served with these Interrogatories is not an unqualified admission:

- (a) State the number of the request;
- (b) State all facts upon which you based your response;
- (c) Identify each person who has knowledge of those facts; and
- (d) Identify all documents that support your response

**RESPONSE TO INTERROGATORY NO. 10 - REQUEST FOR ADMISSION NO. 13**

In addition to KPNV's General Objections, which KPNV incorporates by reference, KPNV specifically objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks information that is maintained by and equally available to DAPs or stated in publicly available documents. KPNV also objects to this Interrogatory on the ground that it calls for a legal argument or legal conclusion. KPNV further objects to the use of the terms "unqualified," "knowledge," and "support" because they are vague, ambiguous, overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving its foregoing objections, KPNV states that from June 26, 2001 that KPNV and Philips GmbH owned 50% plus one share of LG.Philips Displays Holdings B.V. From the second quarter of 2004, KPNV owned 50% plus one share of LG.Philips Displays Holdings B.V.

**INTERROGATORY NO. 11. - REQUEST FOR ADMISSION NO. 14**

If your response to any request for admission in Direct Action Plaintiffs' First Set of Requests for Admission to Philips Defendants served with these Interrogatories is not an unqualified admission:

- (a) State the number of the request;
- (b) State all facts upon which you based your response;
- (c) Identify each person who has knowledge of those facts; and
- (d) Identify all documents that support your response

**RESPONSE TO INTERROGATORY NO. 11 - REQUEST FOR ADMISSION NO. 14**

In addition to KPNV's General Objections, which KPNV incorporates by reference, KPNV specifically objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks information that is maintained by and equally available to DAPs or stated in publicly available documents. KPNV also objects to this Interrogatory on the ground that it calls for a legal



**RESPONSE TO INTERROGATORY NO. 15 - REQUEST FOR ADMISSION NO. 29**

In addition to KPNV's General Objections, which KPNV incorporates by reference, KPNV specifically objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks information that is maintained by and equally available to DAPs or stated in publicly available documents. KPNV also objects to this Interrogatory on the ground that it calls for a legal argument or legal conclusion. KPNV further objects to the use of the terms "unqualified," "knowledge," and "support" because they are vague, ambiguous, overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving its foregoing objections, KPNV lacks sufficient knowledge to either admit or deny DAPs' Request for Admission No. 29 as the Request seeks information about another party.

**INTERROGATORY NO. 16. - REQUEST FOR ADMISSION NO. 30**

If your response to any request for admission in Direct Action Plaintiffs' First Set of Requests for Admission to Philips Defendants served with these Interrogatories is not an unqualified admission:

- (a) State the number of the request;
- (b) State all facts upon which you based your response;
- (c) Identify each person who has knowledge of those facts; and
- (d) Identify all documents that support your response

**RESPONSE TO INTERROGATORY NO. 16 - REQUEST FOR ADMISSION NO. 30**

In addition to KPNV's General Objections, which KPNV incorporates by reference, KPNV specifically objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks information that is maintained by and equally available to DAPs or stated in publicly available documents. KPNV also objects to this Interrogatory on the ground that it calls for a legal argument or legal conclusion. KPNV further objects to the use of the terms "unqualified,"

“knowledge,” and “support” because they are vague, ambiguous, overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving its foregoing objections, KPNV states that it never manufactured or sold any CRT Products.

**INTERROGATORY NO. 17. - REQUEST FOR ADMISSION NO. 31**

If your response to any request for admission in Direct Action Plaintiffs’ First Set of Requests for Admission to Philips Defendants served with these Interrogatories is not an unqualified admission:

- (a) State the number of the request;
- (b) State all facts upon which you based your response;
- (c) Identify each person who has knowledge of those facts; and
- (d) Identify all documents that support your response

**RESPONSE TO INTERROGATORY NO. 17 - REQUEST FOR ADMISSION NO. 31**

In addition to KPNV’s General Objections, which KPNV incorporates by reference, KPNV specifically objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks information that is maintained by and equally available to DAPs or stated in publicly available documents. KPNV also objects to this Interrogatory on the ground that it calls for a legal argument or legal conclusion. KPNV further objects to the use of the terms “unqualified,” “knowledge,” and “support” because they are vague, ambiguous, overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving its foregoing objections, KPNV states that it never sold any CRT Products.

**INTERROGATORY NO. 18. - REQUEST FOR ADMISSION NO. 32**

If your response to any request for admission in Direct Action Plaintiffs’ First Set of Requests for Admission to Philips Defendants served with these Interrogatories is not an unqualified admission:

1  
2  
3 Dated: July 10, 2014

BAKER BOTTS LLP

4   
5

6 Email: [charles.malaise@bakerbotts.com](mailto:charles.malaise@bakerbotts.com)

BAKER BOTTS LLP

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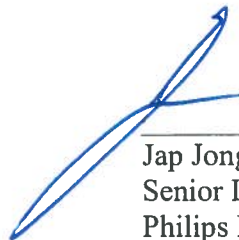
*Attorney for Koninklijke Philips N.V.*

**VERIFICATION**

I, Jap Jongedijk, am Senior Legal Counsel with Philips International B.V., and I am authorized to make this Verification on Koninklijke Philips N.V.'s behalf. I have read the attached Koninklijke Philips N.V.'s Supplementary Objections and Responses to DAPs' First Set of Interrogatories and know its contents. I am informed and believe that the matters and things stated therein are true, and upon that ground allege that the matters and things stated therein are true.

I hereby declare under penalty of perjury under the laws of the United States of America, and pursuant to Title 28, U.S. Code, Judiciary and Judicial Procedure § 1746 "Unsworn Declarations Under Penalty of Perjury," that the facts set forth in the document described above are true and correct.

Executed on July 10, 2014 at Amsterdam, Netherlands.



Jap Jongedijk  
Senior Legal Counsel  
Philips International B.V.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I caused a true and correct copy of the documents listed below to be served by e-mail transmission on July 10, 2014 to each of the persons set forth in the attached service list below.

1. Koninklijke Philips N.V.'s Objections and Responses to Direct Action Plaintiffs' First Set of Interrogatories

Dated: July 10, 2014



Charles M. Malaise

*In re: Cathode Ray Tube (CRT) Antitrust Litigation - MDL No. 1917***SERVICE LIST**

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<i>All defense counsel</i>	